

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:14-00114

RONALD BARNETTE

**RESPONSE TO DEFENDANT'S MOTION TO MODIFY CONDITIONS OF PROBATION**

Comes now the United States of America, by Meredith George Thomas, Assistant United States Attorney for the Southern District of West Virginia, and files this opposition to defendant's motion to modify conditions of probation.

Defendant seeks to hunt on private land in West Virginia, using a compound bow, during the 2016 archery season. The United States appreciates Mr. Barnette complying with his terms of probation and requesting a modification, rather than simply hunting in violation of his terms of probation. As defendant points out, however, his conditions of probation preclude him from possessing a dangerous weapon. Bows are just that -- dangerous weapons.

The United States consulted with defendant's probation officer, who opposes the modification. General considerations for

the safety of the supervising probation officer support the prohibition.

The Court has jurisdiction and discretion to alter or remove the term of probation imposed herein. The United States does not object to the Court exercising that authority and discretion without further argument or evidence.

Respectfully submitted,

CAROL A. CASTO  
United States Attorney

By:

/s/Meredith George Thomas  
MEREDITH GEORGE THOMAS  
Assistant United States Attorney  
WV Bar No.10596  
300 Virginia Street, East  
Room 4000  
Charleston, WV 25301  
Telephone: 304-345-2200  
Fax: 304-347-5104  
Email: meredith.thomas@usdoj.gov

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "RESPONSE TO DEFENDANT'S MOTION TO MODIFY CONDITIONS OF PROBATION" has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 22nd day of November, 2016, to:

Michael B. Hissam, Esquire  
209 Capitol Street  
Charleston, West Virginia 25301

/s/Meredith George Thomas  
MEREDITH GEORGE THOMAS  
Assistant United States Attorney  
WV Bar No.10596  
300 Virginia Street, East  
Room 4000  
Charleston, WV 25301  
Telephone: 304-345-2200  
Fax: 304-347-5104  
Email:meredith.thomas@usdoj.gov